

Before the
Federal Communications Commission
Washington, DC

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Truth-in-Billing
and
Billing Format

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CC Docket No. 98-170

COMMENTS OF OMNIPOINT COMMUNICATIONS, INC.

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November 13, 1998

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Omnipoint Communications, Inc. ("Omnipoint"), through its attorney, submits these comments in response to the issues raised by the Commission in the above-referenced Notice of Proposed Rulemaking ("NPRM").¹ Omnipoint supports the Commission's stated goal of promoting truth-in-billing by requiring telephone bills to be clearly organized with full and non-misleading descriptions of all included charges. However, Omnipoint urges the Commission to establish rules and guidelines in this proceeding that reflect the significant differences between landline service and Commercial Mobile Radio Service ("CMRS").

INTRODUCTION AND SUMMARY

Omnipoint and its affiliates operate several broadband PCS systems in and around New York, Philadelphia, Boston, and Miami. Together, these affiliates hold the Block A license for the New York Major Trading Area ("MTA"), four Block C licenses, and 117 Block D, E, and F licenses throughout the United States. As a competitive wireless entrant, Omnipoint is committed to offering a comprehensive range of wireless services in response to customer

¹ Truth-in-Billing and Billing Format, 63 Fed. Reg. 55077 (Oct. 14, 1998).

demand, including: digital voice CMRS service; enhanced and information services; domestic and international roaming; wireless international calling; and pre-pay calling service options. Because of the competitive nature of the CMRS market, Omnipoint must offer in each of its markets a wide range of services at competitive prices and must employ comprehensible, customer-friendly billing techniques in order to attract and ultimately retain customers.

Omnipoint urges the Commission to take into account the unique market structure and competitive nature of the CMRS marketplace when enacting truth-in-billing rules. CMRS carriers should not be forced to conform billing practices to a model and rules appropriate only for traditional landline carriers. CMRS carriers should not have to make complex, expensive changes to their billing systems to address issues that are not present in the CMRS industry, such as slamming and customer confusion as to the provider of their particular services. In fact, statistical evidence from customer surveys suggests that a great majority of Omnipoint customers find their bills to be easy to understand.

This proceeding should additionally yield clear and workable guidance for carriers, especially competitive CMRS carriers, on the parameters of universal service fund ("USF") collection without mandating that specific language appear on a customer's bill if a carrier chooses to add a line item to recover its USF contribution. In Omnipoint's view, a competitive carrier faces USF charges as a cost of doing business that may be recovered, directly or indirectly, from the rates charged to customers. If a competitive carrier chooses to directly recover its USF contribution through line item charges to its customers, and discloses as much in a clear, straightforward and truthful manner, specific language should not be required. The Commission may elect to provide "safe harbor" language that carriers may use in disclosures to consumers, so long as the particular language is not a specific requirement.

DISCUSSION

I. The Commission Must Tailor Billing Guidelines Such That They Are Appropriate to the Unique Service Offerings and Competitive Market Structure of the CMRS Industry.

Omnipoint wholeheartedly agrees with the overall intent of the NPRM: to establish billing guidelines to ensure that consumers receive accurate and understandable bills from all telecommunications carriers. NPRM, ¶ 6. However, the specific NPRM proposals (¶¶ 17, 18) organizing telephone bills organized by separate categories of service, such as local, long distance, and miscellaneous services are significantly at odds with current CMRS offerings and calling areas, which are organized by MTAs and BTAs, such that CMRS customers have local calling areas which include traditional local and long distance service. Instead, these NPRM proposals are quite obviously modeled after ILEC services and ILEC billing practices.² These proposals do not accurately account for the market and regulatory distinctions that are the hallmark of the differences between the traditional landline service and CMRS service. Omnipoint urges the Commission to take into consideration the unique offerings and competitive market structure of the CMRS marketplace when adopting truth-in-billing regulations. The Commission should not force “one size fits all” regulations on industry segments that have markedly different competitive surroundings. The truth-in-billing rules adopted by the

² For example, the NPRM references pre-subscribed interstate toll carriers and preferred carrier freezes, which have little meaning in the context of PCS services and CMRS. Consistent with Section 332(c)(8) of the Act, the Commission has decided not to impose “equal access” obligations on CMRS operators. Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services, Order, 11 FCC Rcd. 12456 (1996).

Commission must allow CMRS carriers to provide accurate billing descriptions that are consistent with the realities of the CMRS marketplace and customer expectations.

In order to implement a workable truth-in-billing system that will provide meaningful disclosure to consumers, the Commission must acknowledge that there are differences between the market structure of traditional landline services and the CMRS market. For example, CMRS operators do not provide traditional wireline “local,” “interexchange,” or “long distance” service. Cf. NPRM, ¶¶ 17, 18. Rather, CMRS carriers provide competitive wireless service throughout a local calling area spanning traditional local and long distance service areas. Carriers charge for this service either through a bundled fee including minutes of use, or charge a monthly service fee with airtime charges based on minutes of use, in addition to charges for roaming, international, or information services. Furthermore, CMRS carriers are consistently introducing new service offerings and pricing plans designed to better meet customer demand and changing market conditions. The recent introduction of “one-rate” plans by several PCS and cellular operators confirms this vibrant ongoing price and service competition, and is an example of how CMRS offerings simply do not fit in the “service buckets” of the ILEC/IXC model.³ The incumbent local exchange carrier market, by contrast, is largely noncompetitive;⁴ and the implementing proposals of the NPRM track closely to the relatively static model of LEC service

³ The Commission recently recognized the significant differences in CMRS one-rate calling plans, when it stayed its rate integration rules. See Policy and Rules Concerning the Interstate, Interexchange Marketplace, Order, 12 FCC Rcd. 15739, 15743 (1997).

⁴ 1996 Trends in Telephone Service, Industry Analysis Div. – CCB, at Table 9-1 (Feb. 1998).

offerings and LEC bill presentations (i.e., local, toll, interexchange service, and miscellaneous offerings).

The Commission designed PCS specifically to provide the differentiated and responsive wireless offerings that consumers enjoy in the market today. The licensing of PCS according to large multi-state geographic MTA and BTA regions, and not LATAs⁵ or exchange areas, was adopted in order to “spur competition.”⁶ The statutory and regulatory distinctions between ILEC wireline and CMRS abound: (a) CMRS offerings, even when intrastate, are subject to the Commission’s authority;⁷ (b) wireline services are provided under the state-imposed local exchange areas while CMRS services are provided over the Commission’s larger geographic regions;⁸ (c) ILECs are required to provide CMRS service through a structurally separated subsidiary;⁹ (d) CMRS providers do not have to provide IXC equal access;¹⁰ and (e) CMRS offerings of the RBOCs are not subject to interLATA restrictions.¹¹ There is no need for the Commission to apply more rigid truth-in-billing regulations that may be more appropriate for

5 Amendment of the Commission’s Rules to Establish New Personal Communications Services, Second Report and Order, 7 FCC Rcd. 7794 (para.68).

6 Memorandum Opinion and Order, GN Dkt. No. 90-314, 9 FCC Rcd. 4957, 4987-88 (1994).

7 47 U.S.C. §152(b). See also Iowa Util. Bd. v. FCC, 120 F.3d 753, note 21 (8th Cir. 1997).

8 47 C.F.R. §51.701(b)(2).

9 Amendment of the Commission’s Rules to Establish Competitive Service Safeguards for Local Exchange Carrier Provision of Commercial Mobile Radio Services, Report and Order, 12 FCC Rcd. 15668, 15670 (1997).

10 47 U.S.C. §332(c)(8).

11 47 U.S.C. § 271(b)(3).

ILECs than to competitive CMRS providers, where both Congress and the Commission have made appropriate regulatory distinctions between the two classes of providers.

Two FCC cornerstone decisions regarding regulation of CMRS – de-tariffing and flexible use – are especially relevant to regulation of CMRS billing. In the CMRS Second Report and Order, the Commission eliminated the domestic tariffing requirement for CMRS providers because the competitive nature of the CMRS market for domestic services ensured that rates would be reasonable.¹² This detariffing allowed CMRS providers to better respond to market demands by enabling them to change prices and services more rapidly. In the Flexible Use Order, the Commission again found that the public interest is best served by allowing CMRS providers to offer the widest array of services “to better respond to market demand and increase competition in the provision of telecommunications services.”¹³ The Commission stated that “in light of the dynamic, evolving nature of the wireless industry, we are concerned that regulatory restrictions . . . could impede carriers from anticipating what services customers need most”¹⁴

12 CMRS Second Report and Order, 9 FCC Rcd. 1411, 1478-79 (1994). The Commission recently de-tariffed CMRS carriers for international carriage, as well. *Personal Communications Industry Association’s Broadband Personal Communications Services Alliance’s Petition for Forbearance For Broadband Personal Communications Services – Memorandum Opinion and Order and Notice of Proposed Rulemaking*, FCC 98-134, WT Dkt. No. 98-100 (rel. July 2, 1998).

13 In the Matter of Amendment to the Commission’s Rules to Permit Flexible Service Offerings in the Commercial Mobile Radio Services, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd. 8965, 8966 (1996) (“Flexible Use Order”)

14 Flexible Use Order, 11 FCC Rcd. at 8976.

A set of inflexible billing rules would undermine the ability of CMRS operators to achieve the goals of de-tariffing and flexible service deployment by inhibiting carriers' ability to bill for new and innovative services. Moreover, the Commission's reliance on competitive forces, in both the de-tariffing and flexible use orders, to protect consumer interests should carry forward in this proceeding so that CMRS carriers are also afforded billing flexibility.

The Commission must remain mindful of its CMRS competitive policies when it proscribes truth-in-billing regulations. Forcing CMRS operators to conform their customer bills to comply with notions and ideas geared toward noncompetitive ILEC markets will only confuse consumers. Instead, the billing rules and regulations applicable to CMRS providers must be as flexible as CMRS offerings themselves in order to ensure the continued success and introduction of competitive services.

Omnipoint proposes that CMRS operators should adhere to the truth-in-billing principles, and, at the same time, have a significant amount of flexibility to meet the fundamental goals of ensuring fairness and bill transparency to customers through (a) organized and intelligible bills which highlight any service plan changes, (b) descriptions of all charges on the bill, and (c) disclosure of information necessary to make further inquiry regarding the bill. NPRM, ¶ 10. To meet these standards, the Commission should allow CMRS carriers to provide broad descriptions of charges according to the services that the customer has ordered from the CMRS operator. If metered or per-minute usage is a part of the service offering, the carrier should be required to identify the service option, describe the time and date of such usage, the applicable rate, and the total charge for the service usage. Any changes in the customer's service options since the last billing cycle should also be adequately highlighted in the bill. Finally,

customers should also be provided with the toll free telephone number and address of the provider or the provider's customer care representative.

Omnipoint believes it is unnecessary for the Commission to impose additional, specific obligations on CMRS operators beyond the billing principles described in the preceding paragraph.¹⁵ In Omnipoint's experience, customers are aware of CMRS service options and costs. Omnipoint and other competitive CMRS providers incur large expenses advertising and providing promotional materials to potential subscribers. Customers choose and switch calling plans and service packages based on their individual needs, and these customers are informed of exactly what services they will be receiving. Most significantly, the ability of consumers to switch to another CMRS provider in the same market ensures that services are not only competitively priced, but that carriers also provide customer care and treat customers fairly on billing matters.¹⁶ The Commission must remain mindful that the competitive nature of the CMRS market currently does more to ensure truth-in-billing than rigid government regulation would provide.

Finally, the truth-in-billing rules must be sufficiently flexible to avoid imposing billing obligations on certain niche CMRS services. For example, one popular wireless service option provided by Omnipoint is prepay service (called "No-Fee Prepay (sm)"), and customers choosing this service do not receive monthly bills or statements. Customers deposit money into

¹⁵ Omnipoint also notes that the Commission's complaint process remains a viable option for specific consumer complaints, and serves as a further deterrent against unreasonable CMRS billing practices.

an account and, as wireless services are used, the costs of such services are deducted from the balance of the account. This service is similar to a prepay calling card, which includes a certain amount of prepay usage and for which the purchaser never receives a bill. Customers need not have a first-rate credit history in order to take advantage of prepay wireless service. Wireless prepay services support the universality of access to the Public Switched Telephone Network ("PSTN"), because traditional carriers with policies concerning customer credit histories often inhibit low-income and credit-challenged consumers from establishing telephone service of any kind. Additionally, the prepay option allows for easier consumer budgeting of expenses incurred for telephone service. In lieu of monthly bills or statements, Omnipoint's No-Fee Prepay subscribers are informed of the amount of usage remaining in their account in two ways; (1) calling Omnipoint's toll-free customer service number, where the customer receives an update on his current account balance, as well as the expiration date of the minutes remaining in the customer's account; and (2) automatically receiving a reminder message prior to completing a call when the customer's account balance falls below 30 minutes of usage remaining. The reminder message notifies customers of the expiration date and the number of minutes left in the customers of the expiration date and the number of minutes left in the customer's account. In addition, Omnipoint's prepay subscribers are provided with a detailed service brochure when

(footnote continued from previous page)

16 Unlike the market for local exchange services, the Commission has licensed two cellular operators, up to six broadband PCS operators, as well as SMR providers, to ensure vibrant competition for the spending dollars of consumers of wireless services.

they sign up for service,¹⁷ which provides the above-described information in a clear, understandable manner.

Omnipoint believes these services are critically important to low-income and credit-challenged subscribers, and that any billing obligations propounded by the Commission should specifically exempt such services. Omnipoint's substitute for monthly billing, the toll-free account update number and the automatic reminder messages, allows customer expectations to be met because each prepay customer can easily ascertain his or her account balance, along with the expiration date of the minutes remaining in the account. Further, the avoidance of billing costs is one way that wireless carriers like Omnipoint can afford to continue to offer a relatively inexpensive prepay service option. If CMRS carriers are forced to provide prepay service customers with written telephone bills, the flexibility and low-cost nature of this very desirable service is diminished. Billing regulation over prepay options would serve no ascertainable consumer expectations: the customers utilizing the prepay option know that they will not receive a written telephone bill. Omnipoint proposes that such prepay services should be specifically exempted from any general billing requirements.

II. The Federal Regulatory Scheme Ultimately Adopted in This Docket Should Displace the Inconsistent Patchwork of State or Local Regulation.

In this proceeding, the Commission seeks to establish a set of federal regulations to ensure that carriers provide consumers with sufficient information to make informed decisions about which services they use, and which carriers provide those services. As the Commission points out, providing consumers with this necessary information may further the goals of

¹⁷ See Exhibit 1.

competition between service providers as embodied in the Telecommunications Act of 1996. Even prior to the 1996 Act, the 1993 OBRA Amendments to Sections 332 and 309 of the Act promoted a policy of consumer choice, competition, and service innovation in the CMRS industry. Consumers should be able to compare CMRS bills as a method of selecting the best CMRS operator for their needs in furtherance of the goals of federal CMRS regulation. As discussed in Part I above, Omnipoint believes that a set of federal CMRS billing principles and guidelines is appropriate to facilitate consumer awareness and, ultimately, to spur competition.

The patchwork of varying state regulation which developed in response to the ILEC industry is especially harmful to CMRS carriers and is completely inconsistent with the Commission's goal of creating comprehensive yet reasonable set of federal CMRS billing principles. For example, disparate state regulation could be applied to services which may be both intrastate and interstate in the course of a single call. Individual state regulation could also require a CMRS operator with a system that reaches across several states to adopt cumbersome and costly billing practices based solely on whether intrastate services are offered to a given customer. State billing requirements may even be inherently inconsistent, if a given customer lives in one state but oftentimes makes "local" calls in another state (i.e., customers that work in New York City but reside in Northern New Jersey or Connecticut). As these examples typify, state regulations of CMRS billing services that are integrated across a number of states make it "impossible to separate the interstate and intrastate components" of the service for the orderly regulation of CMRS.¹⁸ Instead, disparate state regulation of billing threatens to undermine the

¹⁸ Iowa Util. Bd. V. FCC, 120 F.3d 753, 798 (8th Cir. 1997). Just last month, the Commission recognized the fact that the difficulty of separating interstate and

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proposed federal truth-in-billing approach, and, more broadly, to burden CMRS competition with additional strictures in contravention of the federal regulatory framework for CMRS.

For these reasons, Omnipoint requests that the Commission preempt state regulatory actions which are inconsistent with the proposed federal CMRS billing principles.¹⁹

III. The Commission May Provide Carriers With Non-Mandatory “Safe Harbor” Language if Providers Choose To Pass on Universal Service Fund Charges.

Currently, all carriers are permitted to charge customers on a line-item basis as a way for carriers to recover the cost of their USF contributions. The Commission has held that such line-item costs may be charged to a carrier’s customer, so long as the customer is furnished with complete and truthful information regarding the carrier’s contribution obligation.²⁰ The NPRM (at ¶ 27) seeks comment on whether it should prescribe “safe harbor” language for carriers to employ so that they meet their obligations to provide truthful and accurate information to subscribers regarding the USF line-item charge, and asks industry to provide suggested language. The Commission also solicits comment on whether it is misleading or unreasonable for a carrier

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intrastate revenues on CMRS systems requires the imposition of a “safe harbor” percentage of a federal uniform interstate/intrastate revenues for USF purposes. In the Matter of Federal-State Joint Board on Universal Service, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, CC Docket No. 96-45, ¶¶ 7, 13 (Oct. 26, 1998).

19 California v. FCC, 39 F.3d 919, 933 (9th Cir. 1994) (federal law may preempt state law if the state law would negate valid FCC regulatory goals).

20 Federal-State Joint Board on Universal Service, Report and Order, 12 FCC Rcd. 8776, 9211 (1997) (“Universal Service Order”).

to charge a USF line-item charge that may be higher than the carrier's actual USF cost incurred in the same period. NPRM, ¶ 31.

Omnipoint does not oppose the Commission's adoption of disclosure principles, consistent with industry consensus, that provide a "safe harbor" for carriers against allegations of inadequate disclosure. Omnipoint believes it is unnecessary, however, and may in fact implicate First Amendment issues of commercial speech, for the Commission to require carriers to utilize any specific language.²¹ While it may be helpful for the Commission to offer examples of acceptable language, the Commission's principles should leave it to the carriers to craft their own language within certain guidelines. Omnipoint proposes that a carrier would meet its obligations if it clearly identifies the USF charge on a telephone bill and provides consumers with a one-time written description on the purpose of USF, along with a statement explaining that the Commission does not require carriers to pass along USF charges to its customers. By way of example, Omnipoint proposes that the following "safe harbor" language would be adequate to ensure that a carrier has truthfully and reasonably provided consumers with an accurate description of USF:

In its attempt to comply with the Telecommunications Act of 1996, the Federal Communications Commission's Universal Service Fund Order of May 8, 1998 requires a contribution from every telecommunications carrier to support 'access to telecommunications and information services' to all regions of the country. This fund is used to pay for the development of communications and information services to schools, libraries, hospitals and other consumers in rural, isolated or high cost areas in the nation.

The Universal Service Fund Order allows the telecommunications carriers to pass the cost of the contribution onto the consumer either indirectly, in the form of

²¹ See 44 Liquormart, Inc. v. Rhode Island, 517 U.S. 484 (1996).

higher rates, or directly, in the form of a specific item listed on the statement. [Carrier Name] has chosen to itemize the contribution on your statement as 'Federal Universal Service Fund.' This item will appear monthly to meet [Carrier Name]'s Universal Service Fund contribution requirements ordered by the FCC."

Omnipoint urges the Commission to be flexible in its approach, however, and allow carriers to use any truthful and non-misleading description as "safe harbor" language. The Commission should allow every carrier to determine both how it will present this information to consumers and how often it will provide this information to consumers. Omnipoint recommends adopting a rule that requires carriers to provide this information at the inception of service, and then allow each carrier to determine if and with what frequency the information will be subsequently provided.

On the issue of the exact USF line-item charge (NPRM, ¶ 31), Omnipoint urges the Commission to find that it is reasonable under Section 201(b) of the Act for carriers to use a nondiscriminatory "best estimate" method of determining the line-item charge applied to each subscriber. As the Commission is aware, the carrier cannot know at the time of billing what exact USF contribution will result from the telecommunications revenues derived from a given customer bill. USF contributions derived from a given bill depend on four variables that are not known at the time the carrier issues a bill: (1) the total revenue contribution base of all carriers (including interstate and intrastate) for the current year; (2) the high-cost and low-income cost projections for USF support; (3) the Schools and Libraries and Rural Health Care demand; and

(4) the USF administration costs.²² Because these variables are not known at the time of billing, the carrier cannot know the USF contribution factors that will apply to the revenue anticipated with the customer's bill. Thus, carriers must take a different approach in assessing a line-item charge. Omnipoint has adopted a reasonable "best estimate" approach: apply the most current contribution factors published by the Commission to the customer's applicable telecommunications bill. Carriers that use this or other reasonable "best estimate" methodology should be deemed in compliance with the Commission's rules. As with any "best estimate" methodology, there is a possibility that subscribers could pay a USF line-item charge that, in hindsight, does not reflect the actual contribution factor for that quarter (the subscriber may pay a rate that is either lower than or higher than the actual contribution factor, depending on whether the contribution factor rises or falls over time). In Omnipoint's view, the "best estimate" approach is nondiscriminatory and it requires carriers to use an estimate based on current available data. Thus, it meets the reasonability standard of Section 201(b).

The adoption of a "best estimate" approach is especially compelling in the CMRS context. The competitive market requires carriers to recover USF obligations by increasing service rates, or by a direct line-item assessment. If a carrier chose not to line-item the cost of USF, the carrier would adopt a "best estimate" of the USF costs in establishing and amending its overall rate structure for CMRS services. Omnipoint believes that this method is less consumer friendly, because carriers are more apt to disproportionately burden some subscribers. Ironically,

²² See, generally, *Changes to the Board of Directors of the National Exchange Carrier Association, Report and Order and Second Order on Reconsideration*, CC Dkt. No. 97-21, FCC 97-253, at ¶¶ 45-49 (rel. July 18, 1997).

however, rates that incorporate USF costs in this manner would be subject to *no regulation* by the Commission or the states.²³ Despite this, Omnipoint has chosen line-item billing for USF costs because it believes that equal sharing of the USF costs across all users of the CMRS network (in proportion to the customer's telecommunications revenue) is more fair to all consumers.

Omnipoint asks that the Commission allow CMRS carriers to take such a "best estimate" approach and to handle the revenues derived from the line-item charge in any manner that the carrier deems commercially reasonable provided, of course, that the CMRS carrier ultimately pays its USF obligation to the Commission. Further micro-managing of the carrier's revenue accounts or systems is wholly unnecessary, and contrary to the Commission's deregulatory approach to CMRS services.

²³ CMRS Second Report and Order, 9 FCC Rcd. 1411 (1994).

CONCLUSION

Omnipoint encourages the Commission to adopt reasonable truth-in-billing guidelines which may be necessary for consumers to understand their telephone bills. As applied to CMRS carriers, these regulations should not interfere with the pro-competitive aspects of CMRS services.

Respectfully submitted,

OMNIPOINT COMMUNICATIONS, INC.

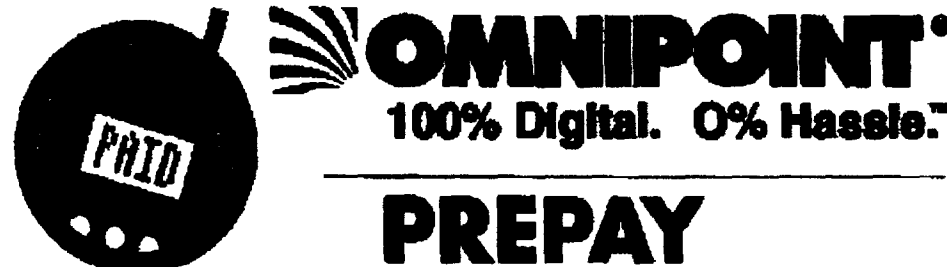
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Date: November 13, 1998

EXHIBIT 1



OPTION 1 (No Monthly Service Fee)

You will receive a reminder message prior to completing a call when your account balance falls below 30 minutes, or when there are 7 days or less remaining until your account balance expires. The announcement will notify you of the expiration date and the number of minutes left in your account (based on calls to the U.S., Canada, Puerto Rico, and the U.S. Virgin Islands). Please note that international calls reduce your minutes from your account at an increased rate.

Balances expire 60 days from the date of your most recent account deposit. Prior to expiration, you can extend the expiration date by depositing additional funds into your account, which "rolls over" any existing minutes in your account to the new 60-day expiration date. For example, if you have 5 minutes left in your account that is due to expire tomorrow, and you deposit a \$50 coupon for 70 more minutes, you'll have 60 days to use the full 75 minutes in your account. Once your account balance reaches zero, your service is suspended. When your account balance expires, your service is suspended and your account balance will be forfeited.

How your Prepay account works.

There is a 30-day money-back guarantee on the unused portion of your first deposit. After 30 days, if you terminate your service, you will not receive any refund.

Restoring your service is as simple as making an additional deposit into your account by calling our Prepay Preferred Customer Line at *808 from your handset. You can make this call even while your service is suspended. If you make the additional deposit...

- **WITHIN 90 DAYS** after your account balance expires, you can still retain the same phone number you had prior to suspension of service.
- **AFTER 90 DAYS**, your account will be cancelled and your phone number is surrendered. Should you wish to start a new Omnipoint account, you will have to purchase a new SIM card (the electronic card in your phone that stores your account information).

To restore your suspended service, if it is...

- **PRIOR TO 90 days**, call our Prepay Preferred Customer Line via *808 from your handset and make a new deposit of at least \$50 into your account. While your service is suspended, you will be responsible for each monthly service fee that has passed.
- **AFTER 90 DAYS**, your account will be disconnected. You are responsible for the monthly service fees for the 3 months that have passed. Should you wish to start a new Omnipoint account, you will have to purchase a new SIM card (the electronic card in your phone that stores your account information).



OMNIPPOINT®
100% Digital. 0% Hassle.™

PREPAY

Option 1 NO MONTHLY SERVICE FEE

Features included:

- Automated Account Management
 - alerts you when your Account balance is low or about to expire (available in English or Spanish)
 - when your Account reaches zero, alerts you with a series of beeps before call termination
- Automated account info via a free call to *808 from your handset
- Caller ID (where available)
- Call Waiting
- Built-in Voice Mail (15 message capacity)
- Numeric Paging (10 pages per month included)
- FREE FOX News Headlines
- Directory Assistance (One minute deducted per call to 411; no additional charge for automatic call completion)
- Your minutes and phone number travel with you (within the Omnipoint network)
- Powerful Encryption Technology

Purchase Option
Minutes Included

\$50
75 minutes

\$100
175 minutes

\$200
400 minutes

Minutes can be used for:

Calls to anywhere in the U.S., Canada, Puerto Rico, and the U.S. Virgin Islands while in the Omnipoint network
All incoming calls 24-hours-a-day, 7-days-a-week, while in the Omnipoint network
Calls to retrieve messages from voice mail (*123) while in the Omnipoint network
Calls to other Omnipoint handsets from within the Omnipoint network
Calls to 800, 877 and 888 numbers while in the Omnipoint network

Monthly Service Fee

\$0

\$0

\$0

- Minutes purchased expire 60 days from the time of your last deposit into your account.
- Roaming outside the Omnipoint network is not available for Prepay subscribers.
- Deductions from your account are in one-minute increments.
- For international calls, minutes will be deducted from your account at an increased rate due to the increased cost of the call.

* Roaming outside the Omnipoint network is not available for Prepay subscribers. * Billing is in one-minute increments.